

Hearing Date: July 20, 2022 at 11:00 a.m., Prevailing Eastern Time
Objection Deadline: July 13, 2022 at 4:00 p.m., Prevailing Eastern Time

Alan W. Kornberg, Esq.
Andrew M. Parlen, Esq.
William A. Clareman, Esq.
John T. Weber, Esq.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

*Proposed Counsel to the Debtor and Debtor in
Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**NOTICE OF SECOND DAY HEARING TO BE
HELD ON JULY 20, 2022 AT 11:00 A.M. (PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE that on June 29, 2022, the above-captioned debtor and debtor in possession (the “Debtor”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that the following motions (the “Motions”) will be heard on a final basis before the Honorable Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 at a hearing scheduled for **July 20, 2022, at 11:00 a.m., prevailing Eastern Time** (the “Second Day Hearing”), or at such other time as the Court may determine:

1. **Claims Agent Retention Application.** Debtor’s Application for Entry of an Order Authorizing Retention and Appointment of Epiq Corporate Restructuring, LLC as

¹ The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

Claims and Noticing Agent under 28 U.S.C. § 156(c), 11 U.S.C. § 105(a), and Local Rule 5075-1 and Granting Related Relief. [Docket No. 2]

2. **Insurance Motion.** Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue Insurance Coverage Entered into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (C) Continue to Pay Brokerage Fees, and (II) Granting Relief. [Docket No. 4]
3. **Wages Motion.** Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief. [Docket No. 5]
4. **Cash Management Motion.** Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Continue to Operate its Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Maintain Investment Practices, and (II) Granting Related Relief. [Docket No. 6]
5. **Suspension Motion.** Debtor's Motion for Entry of an Order (I) Temporarily Suspending its Chapter 11 Case Pursuant to 11 U.S.C. §§ 105 and 305, and (II) Granting Related Relief. [Docket No. 8]
6. **Utilities Motion.** Debtor's Motion for Entry of an Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief. [Docket No. 9]
7. **Paul, Weiss Retention Application.** Debtor's Application for an Order Authorizing the Retention and Employment of Paul, Weiss, Rifkind, Wharton & Garrison LLP as Attorneys for the Debtor and Debtor in Possession *Nunc Pro Tunc* to the Petition Date. [Docket No. 11]
8. **Friedman Kaplan Retention Application.** Debtor's Application for Entry of an Order Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014 and 2016 Authorizing Employment and Retention of Friedman Kaplan Seiler & Adelman LLP as Special Litigation Counsel to the Debtor and Debtor in Possession *Nunc Pro Tunc* to the Petition Date. [Docket No. 12]
9. **Pillsbury Retention Application.** Debtor's Application for Entry of an Order Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014 and 2016 Authorizing Employment and Retention of Pillsbury Winthrop Shaw Pittman LLP as Special Insurance Counsel to the Debtor and Debtor in Possession *Nunc Pro Tunc* to the Petition Date. [Docket No. 13]

10. **Teneo Capital Retention Application.** Application for Entry of an Order Authorizing the Retention and Employment of Teneo Capital LLC, as Financial Advisor to the Debtor and Debtor in Possession, Nunc Pro Tunc to the Petition Date. [Docket No. 14]
11. **Interim Compensation Motion.** Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals. [Docket No. 15]

PLEASE TAKE FURTHER NOTICE that in accordance with General Order M-543 dated March 20, 2020, the Second Day Hearing will be conducted remotely via Zoom for Government. Parties wishing to appear at the Second Day Hearing, whether in a "live" or "listen only" capacity, must make an electronic appearance through the "eCourtAppearances" tab on the Court's <https://www.nysb.uscourts.gov/ecourt-appearances> no later than 4:00 p.m. on the business day before the Second Day Hearing (the "Appearance Deadline"). Following the Appearance Deadline, the Court will circulate by email the Zoom link to the Second Day Hearing to those parties who have made an electronic appearance. Parties wishing to appear at the Hearing must submit an electronic appearance through the Court's website by the Appearance Deadline and not by emailing or otherwise contacting the Court. Additional information regarding the Court's Zoom and hearing procedures can be found on the Court's website.

PLEASE TAKE FURTHER NOTICE that any responses or objections (each, an "Objection") to the relief requested in the Motion shall: (a) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; and (b) be served so as to be actually received by **July 13, 2022 at 4:00 p.m., prevailing Eastern Time**. Replies to the Objections must be filed by **July 18, 2022 at 4:00 p.m., prevailing Eastern Time**.

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motions, the Debtor may, on or after the Objection Deadline, submit to the Bankruptcy Court orders substantially in the form of the proposed orders annexed to the Motions, which orders may be entered with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Second Day Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Second Day Hearing or at a later hearing. The Debtor will file an agenda before the Second Day Hearing, which may modify or supplement the Motions to be heard at the Second Day Hearing.

PLEASE TAKE FURTHER NOTICE that *your rights may be affected*. You should read the Motions carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult with one.

PLEASE TAKE FURTHER NOTICE that copies of each the Motions can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or (ii) from the Debtor's proposed claims and noticing agent Epiq Corporate Restructuring, LLC, at

<https://dm.epiq11.com/case/madisonsquare/info> or by calling (866) 977-1161 (toll free) for U.S. and Canada-based parties or +1 (503) 597-7709 for international parties. Note that a PACER password is needed to access documents on the Court's website.

[Remainder of page intentionally left blank.]

New York, New York
Dated: July 1, 2022

/s/ Alan W. Kornberg

Alan W. Kornberg, Esq.

Andrew M. Parlen, Esq.

William A. Clareman, Esq.

John T. Weber, Esq.

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

1285 Avenue of the Americas

New York, NY 10019

Telephone: (212) 373-3000

Facsimile: (212) 757-3990

akornberg@paulweiss.com

aparlen@paulweiss.com

wclareman@paulweiss.com

jweber@paulweiss.com

*Proposed Counsel to the Debtor and Debtor in
Possession*